

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SARA RIVERS (formerly known as Sara Stokes),

Plaintiff,

-against-

SEAN COMBS (a/k/a “P. DIDDY, DIDDY, PUFF, PUFF DADDY, PUFFY, BROTHER LOVE”), BAD BOY ENTERTAINMENT HOLDINGS, INC., HARVE PIERRE, TRACY WAPLES, ALISON STANLEY, CHRIS SAINSBURY, DEVYNE STEPHENS, MORMA AUGENBLICK, DEREK WATKINS (a/k/a FONZWORTH BENTLEY), TONY DOFAT, MICKEY CARTER, DERIC ANGELETTIE (a/k/a/ “D.Dot” and “MADD RAPPER”), JASON WILEY, BAD BOY ENTERTAINMENT LLC, PHIL ROBINSON, SHAWN PEREZ, DADDY’S HOUSE RECORDING STUDIO, BAD BOY PRODUCTIONS INC., COMBS ENTERPRISES, LLC, UNIVERSAL MUSIC GROUP, UNIVERSAL MUSIC & VIDEO DISTRIBUTION CORP., JANICE COMBS, JANICE COMBS PUBLISHING INC., JANICE COMBS PUBLISHING HOLDINGS INC., SEAN JOHN CLOTHING LLC., PARAMOUNT GLOBAL, VIACOM, MTV PRODUCTIONS, JACKIE FRENCH, LOU PEARLMAN (estate of), BUNIM-MURRAY PRODUCTIONS, TOWNSQUARE MEDIA GROUP, JOHN AND JANE DOES 1-50, and DOE ORGANIZATIONS 1-10,

Defendants.

Case No. 25-cv-01726 (JSR)

ORAL ARGUMENT REQUESTED

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the accompanying memorandum of law, Declaration of Erica A. Wolff dated June 23, 2025 and the exhibits annexed thereto, and upon all prior proceedings had in herein, Defendants Sean Combs, Bad Boy Entertainment Holdings, Inc., Bad Boy Entertainment LLC, Daddy’s House Recording, Inc. (incorrectly sued as Daddy’s House

Recording Studios), Bad Boy Productions Holdings, Inc. (incorrectly sued as Bad Boy Productions Inc.), CE OpCo, LLC (f/k/a as Combs Enterprises, LLC), Janice Combs, Janice Combs Publishing LLC (incorrectly sued as Janice Combs Publishing Inc.), Janice Combs Publishing Holdings Inc., and Sean John Clothing LLC, Defendants (together, the “Combs Defendants”) will move this Court, in accordance with Fed. R. Civ. P. 12(b)(6), before the Honorable Jed S. Rakoff at the Daniel Patrick Moynihan United States Courthouse, Courtroom 14B, 500 Pearl Street, New York, New York 10007, for an order dismissing Plaintiff’s Complaint against the Combs Defendants with prejudice (ECF No. 1).

Dated: June 23, 2025
New York, New York

SHER TREMONTE LLP

/s/ Erica A. Wolff
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